

# **Exhibit 8**

**From:** [Rosenthal, Jeffrey A.](#)  
**To:** [jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com)  
**Cc:** [Mgaloblishvili, Leila](#); [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Levander, Samuel](#)  
**Subject:** Re: Perfectus  
**Date:** Monday, August 30, 2021 9:58:18 AM

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Mazel tov, Joe.

But what does that mean? This has been lingering for a while and your track record has not demonstrated responsiveness to us before. Please propose a time for a call today, tomorrow or Wednesday and we will hold off contacting the court.

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**Jeffrey A. Rosenthal**

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On Aug 30, 2021, at 9:51 AM, [jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com) wrote:

So sorry. I am at my son's wedding now. Please be patient.

On Aug 30, 2021 15:58, "Mgaloblishvili, Leila" <[lmgaloblishvili@cgsh.com](mailto:lmgaloblishvili@cgsh.com)> wrote:

Joe,

We are following up regarding the below. Unless we hear from you by the close of business tomorrow, we plan to write to the Court on this matter.

Best,

Leila

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**Leila Mgaloblishvili**

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**From:** Mgaloblishvili, Leila <[imgaloblishvili@cgsh.com](mailto:imgaloblishvili@cgsh.com)>  
**Sent:** Tuesday, August 24, 2021 12:41 PM  
**To:** [jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com)  
**Cc:** Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Subject:** RE: Perfectus

Joe,

We are following up regarding the deficiencies in Perfectus's productions.

As you are aware, in our motion to compel production by Perfectus, which the Court granted in full on May 22, 2021, ECF No. 91, 2021, we identified a number of gaps in Perfectus's productions, including but not limited to the absence in whole or in part of:

- Communications between Perfectus and other BSG Entities (Request 3);
- Perfectus's complete set of bank records and tax filings (Requests 4, 5, and 12);
- Perfectus's board meeting minutes (Request 6);
- Perfectus's financial statements (Request 7);
- Perfectus's current corporate organizational chart (Request 8); and
- Due diligence documents related to Perfectus's real estate investments (Request 14).
- Documents covering the full date range of Vale's production requests, including documents from 2010 and through August 2020.

Perfectus's latest production continues to suffer from the same defects. In

addition, your production is facially deficient because Perfectus has failed to provide attachments to the emails included in the production, contains unspecified redactions without a corresponding redactions or privilege log, and appears to contain a number of documents which were forwarded in previous years and have their sender and recipient unspecified. We would like to discuss the timeframe for Perfectus to complete its long overdue production and certain questions pertaining to the documents you have provided.

Please let us know your availability for a call to discuss this week, as we would like to resolve this consensually without having to report noncompliance to Judge Wang.

Best,

Leila

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**Leila Mgaloblishvili**

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**From:** Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Sent:** Wednesday, June 23, 2021 4:07 PM  
**To:** Joe Hellerstein <[jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>  
**Cc:** Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Mgaloblishvili, Leila <[lmgaloblishvili@cgsh.com](mailto:lmgaloblishvili@cgsh.com)>  
**Subject:** RE: Perfectus

Joe,

We confirm that we received documents from you on Monday.

Is your representation that your production is now complete? Does the production include each of the categories of documents identified on p. 3 of

Vale's motion to compel (ECF No. 88), as so-ordered by the Court yesterday (ECF No. 91)? If the production is not complete, what categories of documents have you produced and what categories of documents do you still need to produce?

Best regards,

Sam

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**Samuel Levander**

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**From:** Joe Hellerstein <[jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com)>  
**Sent:** Tuesday, June 22, 2021 4:55 AM  
**To:** Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Cc:** Joe Hellerstein <[jzh@hellerstein-law.com](mailto:jzh@hellerstein-law.com)>  
**Subject:** RE: Perfectus

Jeff, Sam,

Please confirm that you received the documents. Thanks.

Joe

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**From:** [Joe Hellerstein](#)  
**Sent:** Monday, June 21, 2021 6:54 PM  
**To:** [Saenz, Andres](#)  
**Cc:** [Rosenthal, Jeffrey A.](#); [Vicens, Elizabeth \(Lisa\)](#) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>;

[Balter, Emily <ebalter@cgsh.com>](mailto:ebalter@cgsh.com); [Levander, Samuel](mailto:Levander, Samuel); [Mgaloblishvili, Leila <lmgaloblishvili@cgsh.com>](mailto:Mgaloblishvili, Leila <lmgaloblishvili@cgsh.com>)

**Subject:** Perfectus

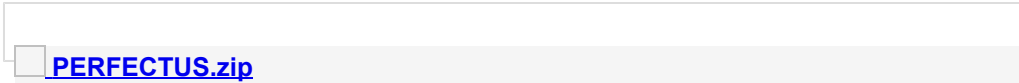
Attached please find Respondents documents in response to the subpoenas and Petitioners' motion to compel production.

Joseph Z. Hellerstein

Hellerstein & Co.

Israel 972-52-420-1114

US 561-367-2569



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